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Attorneys for Plaintiffs
TACSIS APC and KENT LIMSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TACSIS APC, a California corporation;
and KENT LIMSON, an individual,

Plaintiffs
v.

JACKIE ROBINSON, an individual; ALL
NET LAND DEVELOPMENT, LLC, a
Nevada Limited Liability Company; ALL
NET, LLC, a Nevada Limited Liability
Company; DRIBBLE DUNK, LLC, a
Nevada Limited Liability Company; AGS
ASSURETY, LLC, a Nevada Limited
Liability Company; TIMOTHY J.
ARELLANO, an individual; DAVID
LOWDEN, an individual; MESSNER
REEVES LLP, a Colorado Limited
Liability Partnership; TORBEN WELCH,
an individual; LORING JACOBS, an
individual, and DOES 1 THROUGH 100
INCLUSIVE,

Defendants.

Case No: 2:24-cv-02284-RFB-EJY

**JOINT STIPULATION AND ORDER
STAYING DISCOVERY PENDING RULING
ON MOTIONS TO DISMISS**

Pursuant to L.R. 7-1, Plaintiffs and Defendants, by and through undersigned counsel, stipulate to stay all discovery in this action pending the Court's ruling on Defendants' Motions to Dismiss (ECF Nos. 13, 35 and 36), as set forth below.

RECITALS

WHEREAS, on January 17, 2025, Defendants ALL NET LAND DEVELOPMENT, LLC and DAVID LOWDEN filed their Motion to Dismiss Plaintiffs' Complaint, or alternatively, to Stay this Action under *Colorado River*. (ECF No. 13).

WHEREAS, on February 11, 2025, Defendants MESSNER REEVES and TORBEN WELCH filed their Motion to Dismiss (ECF No. 35).

WHEREAS, on February 11, 2025, Defendants JACKIE ROBINSON, ALL NET, LLC, DRIBBLE DUNK LLC, and LORING JACOBS filed their Motion to Dismiss (ECF No. 36).

WHEREAS, the Motions to Dismiss seek dismissal of all claims with prejudice.

WHEREAS, the parties have conferred and agreed that a stay of discovery pending the Court's ruling on Defendants' Motions to Dismiss (ECF Nos. 13, 35 and 36) is appropriate and will conserve resources in accord with Federal Rule of Civil Procedure 1 by avoiding the need for further briefing and a hearing upon Defendants' Motion to Stay. *Glass v. Global Widget, LLC*, 2020 U.S. Dist. LEXIS 32292, No. 2:19-cv-1906-MCE-KJN, *2 (E.D. Cal. Feb. 25, 2020) ("Without commenting on the merits of Defendant's motion, it is possible that all claims brought by Plaintiff could be dismissed with prejudice. Thus, a stay of discovery is in line with the principles of judicial economy and the Federal Rules of Civil Procedure.")

THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1. All discovery in this action shall be stayed pending the Court's ruling on Defendants' Motions to Dismiss, or subject to any such other Order as may be issued by the Court.

2. All parties will reconvene under Rule 26(f) within 21 days following the ruling on the last of the Motions (ECF Nos. 13, 35 and 36).

Respectfully submitted.

(Signatures to follow on Next Page)

DATED: March 14, 2025

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DATED: March 14, 2025

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DRIBBLE DUNK LLC and LORING JACOBS

IT IS SO ORDERED.

**IT IS FURTHER ORDERED that the
hearing on April 2, 2025 at 1:30 p.m. is
VACATED.**


U.S. MAGISTRATE JUDGE

Date: March 17, 2025

DATED: March 14, 2025

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DATED: March 14, 2025

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